

# Mother Lode Wastewater Compliance

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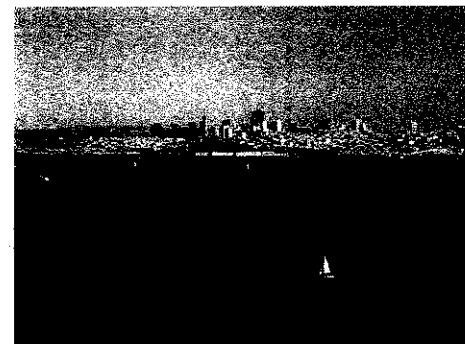
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SWRCB Grade IV-5211

SWRCB Contract Operator #0094

DOHS Water Treatment Plant Operator Grade T1 # 25839

DOHS Water Distribution Operator Grade D1 # 29840



27 March 2007

Tam Doduc, Chair and Members  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814  
Attention: Song Her, Clerk to the Board

[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



Re: Statewide Water Recycling Policy

Dear Chair Doduc and Members of the Board:

I am a wastewater operations contract operator serving both municipal and private clients in California. I have over 25 years experience in the field, with a portfolio that includes regulation of industrial dischargers, groundwater investigations, and water recycling as well as wastewater treatment.

The first point I would like to make is that, notwithstanding the title of this workshop, "Workshop Regarding Development of a Statewide Water Recycling Policy," such a policy already exists. I refer to SWRCB Resolution 77-1, "Policy With Respect to Water Reclamation in California." It is clear that the basic thrust of 77-1 was reiterated in the Recycled Water Task Force 2003 report, which is that encouragement of recycling is in the interest of the citizens of California.

I agree with the Task Force recommendation that consistent application of state statutes and regulations regarding water recycling and water quality is fundamentally important to encourage agencies and other entities to either continue recycling projects or take on new such projects. This is probably the most important issue under discussion here because the current uncertainty as to how stringently a given project will be regulated is a major roadblock for recycling projects and a level playing field can only help.

Regarding the specific items listed in the workshop agenda, I would point out that, as of 2003, half a million acre-feet, or 1.6 Billion gallons of wastewater were recycled annually. Consequently, there should exist a comprehensive database from which to

work that I would urge be evaluated. Clearly, due to the theoretical nature of the questions posed, there does not appear to be an imminent emergency from recycled water application.

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I can definitively state that, from my experience with a project that has a 13-year history of Title 22 2-23 application on a golf course, there has been no build-up of Nitrates; in fact, Nitrates in first-encountered groundwater are reduced below background levels across the site. Salts likewise have not accumulated to any significant degree. Clearly in our case no nutrient management plan should be required. Of course, I wouldn't be able to state this without having a groundwater monitoring program.

Regarding the specific questions the Board is seeking input on, I would urge that an Incidental Runoff component be included that allows for individual management plans and that recognizes the statutory "Notification Threshold" for Title 22 2-23 effluent of 50,000 gallons that is found at Water Code Section 135292 (a).

In addition to the foregoing, I firmly concur with the Water Reuse Association comments presented at the workshop, and subsequently in writing on this topic.

Respectfully,

Julio S. Guerra, Principal  
Mother Lode Wastewater Compliance